

EXHIBIT 11



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JEFF GADDY
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BRENTON J. GOODMAN
JOSHUA R. HARRIS

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D. PATRICK LEWIS
(LICENSED ONLY IN
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M. JUSTIN LUSKO
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MIKE PAPANTONIO
CHRISTOPHER G. PAULOS
EMMIE J. PAULOS
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AND MARYLAND)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

March 21, 2020

Via Electronic Mail

Steven J. Boranian
Reed Smith LLP
101 Second Street
Suite 1800
San Francisco, CA 94105-3659

**RE: In Re National Prescription Opiate Litigation, No. 17-md-2804 Cabell County
Commission v. AmerisourceBergen Drug Corporation, et al., Case No. 1:17-op-
45053 (S.D. W. Va.)**

Steven,

I write in response to your March 6th and March 19th letters.

First, I can confirm that Cabell County is collecting custodial files, where available, for the 48 unique custodians outlined in your letter.¹ However, we do note that you have misspelled the name of three custodians on your list. JR Van Ottingham should be JR Vanootegham. Additionally, Dan Ennix is actually Dale Enochs. Also, Chuck Zirkle, Jr. should be Chuck Zerkle, Jr. With those clarifications, we have agreed to collect custodial files for those listed individuals to the extent custodial files are available for collection.

Second, as we have indicated on multiple prior occasions, we object to the collection or production of custodial files for the custodians you have requested from the Prosecutor's Office. Our position will not change on those custodians.

Third, while we were initially permitted to collect some documents for some Cabell-Huntington Health Department custodians, the Cabell-Huntington Health Department has since made it clear we are no longer authorized to make further collections or productions of their

¹ We believe the proper number of custodians is 48, rather than the 50 custodians you reference because Dan Marcum appears on your list twice and Joe and Joseph Whitt is the same person.

documents. As noted previously, you should direct any additional document requests to Cabell-Huntington Health Department directly.

Fourth, I write to provide the following production status updates for various Cabell County custodians. Consistent with Rule 34, to the extent their data is within Cabell County's possession, custody, or control, production for the following custodians is substantially complete:

Bailey, Bob
Bates, Betty
Bates, Clayton
Blankenship, Margy
Cartmill, Nancy
Cole, Ryan
Cox, Larresca
Davis, Mike
Davis, Sandy
Enochs, Dale
Ferguson, Doug
Frye, Suzanne
Hood, Jeff
Marcum, Dan
McComas, Natalie
McComas, Tracey
McCoy, Janet
Morgan, Jim
Murray, Stephen
Priddy, Connie
Ross-Woodrum, Rose
Saunders, April
Shoemaker, Greg
Smith, Phyllis
Sobonya, Kelli
Tatum, Chris
Tatum, Mike
Vanooteghem, J.R.
Vititoe, Steve
Webb, Brenda
Whitt, Joe
Yon, Ann

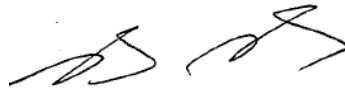
Production for the following custodians is partially complete:

Adams, Doug
Allen, Faye
Childers, Samantha
Johnson, Irv
Merry, Gordon
Thompson, Beth
Wright, David
Zerkle, Chuck

Finally, for the following custodians, despite a diligent search, Cabell County has been unable to locate a custodial file and believes in good faith that a custodial file does not exist in Cabell County's custody, possession, or control:

Adkins, Ottie
Bias, Scott
Chandler, Adele
McComas, Tom
Sheidler, James
Steele, MaryBeth
Wolfe, Kim
Zoeller, Stephen

Sincerely,

A handwritten signature in black ink, appearing to be 'B L Bogle', written in a cursive style.

Brandon L. Bogle
Counsel for Plaintiff